1		DIRECT TESTIMONY OF								
2		GEORGE A. LIPPARD III								
3		ON BEHALF OF								
4		SOUTH CAROLINA ELECTRIC & GAS COMPANY								
5		DOCKET NO. 2010-2-E								
6										
7	Q.	PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND POSITION								
8		WITHIN SOUTH CAROLINA ELECTRIC & GAS COMPANY ("SCE&G"								
9		OR "COMPANY").								
10	A.	My name is George A. Lippard III. My business address is P.O. Box 88,								
11		Jenkinsville, South Carolina. I am employed by SCE&G as the General Manager								
12		of Nuclear Operations at the Virgil C. Summer Nuclear Station ("VCSNS" or								
13		"V.C. Summer").								
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15	Q.	DESCRIBE YOUR EDUCATIONAL BACKGROUND AND YOUR								
16		BUSINESS EXPERIENCE.								
17	A.	I earned a Bachelor of Science degree in Mechanical Engineering from								
18		Clemson University in 1979 and a Master of Business Administration degree								
19		from the University of South Carolina in 1982. I joined SCE&G in 1983 as a								
20		Nuclear Training Instructor at VCSNS. I received a Senior Reactor Operator								
21		Certification in 1986 and a Senior Reactor Operator License in 1992 from the								
22		United States Nuclear Regulatory Commission ("NRC"). Since joining the								

Company, I have held positions in the Operations, Outage Management, Licensing, and Training organizations. Most recently, I served for over five years as V.C. Summer's Operations Manager until I was promoted to General Manager of Nuclear Operations at V.C. Summer Station in February 2010.

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#### Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

The purpose of my testimony is to review the operating performance of VCSNS during the period from January 1, 2009 through December 31, 2009 ("Review Period").

#### WHAT ARE SCE&G'S OBJECTIVES IN THE OPERATION OF VCSNS?

SCE&G's primary objective at VCSNS is safe and efficient operation. The Company also strives for excellence in all phases of operation of the facility. The station's key focus areas of SAFETY, reliability, outage and work management, work force development, and organizational effectiveness constitute our core business plan elements. SCE&G's constant improvement in these areas over the years has facilitated VCSNS's outstanding service record. Furthermore, our business objectives are focused on maintaining a competitive production cost for the generation of electricity using nuclear fuel.

### 1 Q. WHAT HAS BEEN THE COMPANY'S EXPERIENCE WITH THE 2 PERFORMANCE OF THE VCSNS?

SCE&G continuously meets or exceeds all NRC requirements and Institute of Nuclear Power Operations ("INPO") standards. VCSNS has performed well during the Review Period. Consistent with the provisions of Section 58-27-865 of the South Carolina Code of Laws, as amended, V.C. Summer's net capacity factor based on reasonable excludable nuclear system reductions during the Review Period was 101.7%, and the gross generation output was 7,148,589 megawatt hours.

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#### Q. DID VCSNS EXPERIENCE ANY OUTAGES DURING THE REVIEW PERIOD?

Yes. During the Review Period, VCSNS experienced three outages—one planned outage and two forced outages. After setting a continuous run record of 475 days, VCSNS experienced a forced outage on October 2, 2009 due to a failure in the main generator breaker. The unit remained offline for almost 11 days, returning to service on October 13, 2009.

The unit began to reduce its generation output in a controlled manner on October 16, 2009 and was shut down completely just after midnight on October 17, 2009 to conduct V.C. Summer's 18th scheduled refueling outage ("RF18"). This planned outage exceeded the estimated 43-day outage period by almost 12 days primarily due to repair of the Balance of Plant ("BOP") switchgear, which

was damaged during the outage. VCSNS returned to service on December 10, 2009.

On December 16, 2009, VCSNS experienced another forced outage due to a faulty main turbine control valve. The unit returned to service the following day.

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### Q. PLEASE DESCRIBE THE CIRCUMSTANCES LEADING TO THE FORCED OUTAGE OF VCSNS ON OCTOBER 2, 2009.

After a plant record of 475 days of continuous run, on the morning of October 2, 2009, a failure in the main generator output breaker, which is located on the non-nuclear side of the plant and helps tie the plant to the power grid, caused a main generator stator ground. In response to the main generator stator ground, a protective relay initiated a main turbine trip, which in-turn caused the reactor at VCSNS to automatically shut down. The unit's response to the shutdown was normal, and all systems responded as designed and required.

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### Q. WHAT MEASURES WERE TAKEN TO RETURN THE UNIT TO SERVICE?

Upon examination, SCE&G discovered that the "B" phase contact of the main generator output breaker was damaged. SCE&G replaced the damaged breaker contact. Prior to placing the unit back into service, SCE&G tested the new breaker, and SCE&G performed additional checks for potential system

grounds.	All of these	tests produced	satisfactory	results,	and	VCSNS	returned	to
service or	n October 13,	, 2009.						

- 4 Q. PLEASE EXPLAIN THE KEY WORK FUNCTIONS SCE&G
  5 ACCOMPLISHED DURING THE REFUELING OUTAGE WHICH
  6 BEGAN ON OCTOBER 17, 2009.
  - A. During the refueling outage, approximately one-third of V.C. Summer's 157 fuel assemblies were replaced, and scheduled maintenance work that cannot be performed when the plant is in operation was conducted. During this time, over 3,000 routine tasks including preventative maintenance, corrective maintenance, and surveillance testing tasks were completed successfully. More specifically, SCE&G accomplished the following major tasks:
    - Replacement of the Main Power Transformer. The existing main power transformer was replaced with a new, more efficient main power transformer equipped with self-diagnostic capabilities.
    - Reconfiguration of Coolant Flow in Reactor Vessel. The Company reconfigured the flow of coolant in the pressurized water reactor of VCSNS from a downflow configuration to an upflow configuration to minimize the effects of "baffle jetting," a hydraulic-induced instability or vibration of fuel rods caused by the high velocity jet of water flowing through the reactor. Although baffle jetting is quite common in nuclear reactors with a downflow configuration, it can cause fuel rods to leak and disburse uranium

into the coolant. Reversing the flow of the coolant from a downflow configuration to an upflow configuration is designed to prevent baffle jetting by equalizing the differential hydraulic pressure within the core.

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- System"). The DRPI System is a digital display system that provides the control room operator with an indication of the position of the control rods used to control the reactor. During Refueling Outage 17 in 2008, SCE&G discovered that the DRPI System was not functioning properly and repaired the system to fix the problem for the short term. As a long term solution, SCE&G replaced the existing DRPI System with a new one during RF18.
- Replacement of the Feedwater Regulating Valve Positioners. The Company replaced the existing feedwater regulating valve positioners with redundant dual digital positioners. The replacement positioners represent a technological upgrade and provide a back-up in case of a positioner failure.

## Q. PLEASE EXPLAIN THE PRIMARY REASON THAT RF18 LASTED LONGER THAN EXPECTED.

On November 22, 2009, after finishing the replacement of the main power transformer, VCSNS closed a breaker in the switchyard to energize and warm up the new main transformer. Grounds in the switchgear for the normal feeds had been used to protect workers under a tag out during other prior maintenance activities. These grounds remained in place when the breaker was closed to

energize the main transformer. The unremoved grounds resulted in a short circuit, which caused an arc flash resulting in a small fire. SCE&G quickly extinguished the fire, but it caused damage in one cubicle of each of the three BOP switchgear which required repair.

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### Q. PLEASE DESCRIBE THE CAUSE OF THE FORCED OUTAGE OF VCSNS ON DECEMBER 16, 2009.

On December 10, 2009, VCSNS returned to service from RF18. Around midnight on December 13, the unit had reached 95% power when a vibration was noted in the pipes which supply hydraulic fluid to position the main turbine control valves. To stop the vibration, SCE&G lowered the power level of the reactor to 80%. On December 16, 2009, the Company decided to ramp the power level down to 40%. At this power level, the Company could manually trip the turbine offline and repair the faulty turbine control valve, but leave the reactor in critical mode. In critical mode, the reactor continues to generate heat, which produces steam; rather than being sent to turbine to generate electricity, the steam is sent to the condenser via the Steam Dump System ("SDS"). After the manual turbine trip, however, the SDS failed to operate, forcing the Company to manually trip the reactor. The Company then replaced the part of the main turbine control valve that had caused the original vibration as well as an electronic card that caused the SDS failure, and VCSNS returned to service on December 17, 2009.

#### Q. WHEN WILL THE NEXT REFUELING OUTAGE OCCUR?

A. Refueling outages are scheduled every 18 months to replace depleted fuel assemblies. Maintenance and testing that cannot be done with the plant on-line are also conducted during the refueling outage. SCE&G's next refueling outage, 5 Refueling Outage No. 19, is scheduled for April 2011.

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#### Q. PLEASE EXPLAIN THE ROLES OF INPO AND THE NRC WITHIN THE NUCLEAR INDUSTRY AND DESCRIBE ANY RANKINGS RECEIVED BY VCSNS FROM THOSE AGENCIES.

INPO is a nonprofit corporation established by the nuclear industry to promote the highest levels of nuclear safety and plant reliability. INPO promotes excellence in the industry in the operation of nuclear electric generating plants. For the applicable reporting period, INPO rated VCSNS's overall performance as exemplary which is the highest rating awarded.

The NRC is responsible for the licensing and oversight of the civilian use of nuclear materials in the United States. The NRC has reported that VCSNS operated in a manner that preserved public health and safety and fully met all cornerstone objectives. During the reporting period, the NRC implemented no supplemental inspections beyond the base inspection scope.

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# Q. WHAT IS THE SPENT FUEL STORAGE CAPABILITY FOR VCSNS AND WHAT IS THE PLAN FOR DEVELOPMENT OF A DRY FUEL STORAGE FACILITY?

4 A. V.C. Summer has sufficient capacity for spent fuel storage in the spent fuel pool through the 23<sup>rd</sup> refueling outage in 2017. This allows capacity for a full core off-load in addition to the spent fuel stored in the pool. The plant is already developing plans for the construction of a dry fuel storage facility that will need to be in service by 2015.

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#### 10 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

11 A. Yes.